



MEMO ENDORSED

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LAW DEPARTMENT

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August 6, 2008

BY FACSIMILE

Honorable James C. Francis
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Rm. 1960
New York, NY 10007

Re: Brown v. Commissioner of the Administration for Children's Services
08-CV-6404 (RMB) (JCF)

Dear Judge Francis:

I am the attorney in the Office of the Corporation Counsel representing the Commissioner of the Administration for Children's Services ("ACS") in this matter. Though difficult to discern from the Complaint, it appears that plaintiff, proceeding *pro se*, is alleging that ACS conspired with a family court judge in "secret hearings" to violate his due process rights.

I write to respectfully request that defendant's time to respond to the Complaint be extended to September 15, 2008. The response to the Complaint is currently due August 6, 2008. This is defendant's first request for an extension of time in this matter. I apologize for the last-minute request, however I have just been assigned to this case. The additional time is necessary to investigate the allegations in plaintiff's Complaint and to obtain and review the underlying family court proceedings. Plaintiff has not provided a telephone number at which he may be contacted, and therefore, I have been unable to obtain his consent to this request.

Thank you for your consideration of defendant's request for their time to respond to the Complaint to be extended to September 15, 2008.

Respectfully,

Michael A. Suarez
Assistant Corporation Counsel

cc: Darryl Brown

8/7/08
Application granted.

SO ORDERED.

James C. Francis IV
USMJ